

EXHIBIT 377

Highly Confidential - Subject to Further Confidentiality Review

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL)	
PRESCRIPTION)	MDL No. 2804
OPIATE LITIGATION)	
_____)	Case No.
)	1:17-MD-2804
)	
THIS DOCUMENT RELATES)	Hon. Dan A.
TO ALL CASES)	Polster

THURSDAY, NOVEMBER 8, 2018

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

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Videotaped deposition of Steven
Mills, held at the offices of BARTLIT BECK
HERMAN PALENCHAR & SCOTT LLP, 54 West
Hubbard, Suite 300, Chicago, Illinois,
commencing at 9:07 a.m., on the above date,
before Carrie A. Campbell, Registered
Diplomate Reporter and Certified Realtime
Reporter.

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<p style="text-align: right;">Page 22</p> <p>1 prevent anything like this from happening 2 again. 3 Q. Okay. And was there also an 4 investigation on the facility in Ohio at the 5 same time but they hadn't seized it? 6 MR. HILL: Object to the form. 7 Foundation. 8 THE WITNESS: I don't know. 9 QUESTIONS BY MR. SHKOLNIK: 10 Q. And when you first got together 11 with Ms. Polster, did you ask her, "What did 12 we do at Walgreens before 2000 -- 13 December 2012 in terms of suspicious order 14 monitoring since we're now going to implement 15 the program for going forward?" 16 A. I can't remember if I ever had 17 that conversation. 18 Q. Well, did you ever undertake 19 any investigation on your own to say, "What 20 were we doing to monitor suspicious orders in 21 our company before I got charged with that 22 job?" 23 MR. HILL: Object to the form. 24 THE WITNESS: No. 25</p>	<p style="text-align: right;">Page 24</p> <p>1 Foundation. 2 THE WITNESS: Yes. 3 QUESTIONS BY MR. SHKOLNIK: 4 Q. I mean, that's your 5 responsibilities for the company, to do that 6 as best as you can, correct? 7 MR. HILL: Same objections. 8 THE WITNESS: Yes. 9 QUESTIONS BY MR. SHKOLNIK: 10 Q. And your team of two people 11 grew after December of 2012, correct? 12 A. Yes. 13 Q. Now, over the period of time 14 after 2012, did you continue to have some 15 further understanding that the epidemic in 16 the United States, the opioid epidemic, was 17 growing -- a growing problem? 18 MR. HILL: Object to the form. 19 THE WITNESS: Just from what 20 I've noticed in the news. 21 QUESTIONS BY MR. SHKOLNIK: 22 Q. Did you notice that any 23 other -- that any companies were implicated 24 or in some way referenced as being part of 25 the cause of the epidemic?</p>
<p style="text-align: right;">Page 23</p> <p>1 QUESTIONS BY MR. SHKOLNIK: 2 Q. Was it your understanding that 3 there were some failures on the part of 4 Walgreens in terms of suspicious order 5 monitoring for opioids prior to 2012? 6 A. Yes, that is my understanding. 7 Q. And I take it you took it very 8 seriously, when you were assigned to this new 9 team, to make sure those type of failures 10 didn't happen again, correct? 11 A. Correct. 12 Q. And that was the goal of the 13 integrity team: Let's put something in place 14 that's not going to let these prior failures 15 happen again. 16 MR. HILL: Object to the form. 17 THE WITNESS: Correct. 18 QUESTIONS BY MR. SHKOLNIK: 19 Q. And would it be fair to say 20 that from that point on, when you got 21 involved, you have done your best to make 22 sure that Walgreens adheres to the -- the 23 letter of the law in terms of suspicious 24 order monitoring as best as you could? 25 MR. HILL: Object to the form.</p>	<p style="text-align: right;">Page 25</p> <p>1 MR. HILL: Same objection. 2 THE WITNESS: Just what I've 3 noticed in the news and in reading. 4 QUESTIONS BY MR. SHKOLNIK: 5 Q. I understand. 6 So tell me some of the 7 companies that you came to understand were 8 sort of implicated in this opioid epidemic 9 developing. 10 MR. HILL: Object to the form 11 and calls for speculation. 12 THE WITNESS: Nothing really 13 stands out at the moment. That was 14 several years ago. I can't recall. 15 QUESTIONS BY MR. SHKOLNIK: 16 Q. How about Purdue Pharma? Does 17 that name ring any bells that may have been a 18 factor in developing the epidemic, the opioid 19 epidemic? 20 MR. HILL: Same objections. 21 THE WITNESS: I know that they 22 manufacture OxyContin. That's a very 23 potent opioid. 24 QUESTIONS BY MR. SHKOLNIK: 25 Q. You've also come to know that</p>

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